

EXHIBIT K

From: [Lauter, Judd](#)
To: [Reed Forbush](#); [Maxwell Pritt](#); [Morton, Phillip](#); [Stameshkin, Liz](#); [David Simons](#); [Dunning, Angela L.](#); [Kathleen Hartnett](#); [mlemley@lex-lumina.com](#); [Ghajar, Bobby A.](#); [Ghazarian, Colette A](#)
Cc: [Jesse Panuccio](#); [Poppell, Cole A](#); [Biksa, Liene](#); [Weinstein, Mark](#); [Alvarez, Jessica](#); [Holden Benon](#); [Christopher Young](#); [Aaron Cera](#); [Cadio Zirpoli](#); [Joe Saveri](#); [Margaux Poueymirou](#); [Ashleigh Jensen](#); [Rya Fishman](#); [Matthew Butterick](#); [Nada Djordjevic](#); [James Ulwick](#); [Bryan L. Clobes](#); [Mohammed Rathur](#); [Amy Keller](#); [David Straite](#); [Ruby Ponce](#); [Alexander Sweatman](#); [Heaven Haile](#); [Llama BSE](#); [Josh Schiller](#); [David Boies](#); [z/Meta-Kadrey](#)
Subject: RE: Kadrey v. Meta - Depositions
Date: Tuesday, October 22, 2024 11:58:00 AM
Attachments: [2024-10-22 Kadrey - Joint Status Report 11_45 am.docx](#)

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Counsel,

Our edits are reflected in the attached. We observe that the report has a section on “discovery disputes” that is beyond the scope of the status report on depositions (as ordered by the Court) and does not belong in this document. Rather than engage in impromptu argument over perceived disputes on both sides, we would remove that section. Please confirm.

Moreover, we were surprised to read in the draft that you contacted the Court *ex parte*. Previously, when the parties contacted the Court, they would do so via email, copying all counsel, and that is what we understood Plaintiffs intended to do. Please confirm that, in the future, Plaintiffs will contact the Court by email and with copy to all counsel of record.

Regards,
Judd

From: Reed Forbush <rforbush@BSFLLP.com>
Sent: Tuesday, October 22, 2024 11:39 AM
To: Maxwell Pritt <mpritt@BSFLLP.com>; Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>
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Subject: Re: Kadrey v. Meta - Depositions

[External]

Counsel - please advise on status of this noon filing.

Reed

From: Reed Forbush

Sent: Tuesday, October 22, 2024 9:34:59 AM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <DSimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Counsel – Please find attached the Joint Status Report for filing at noon today.

Reed

646-339-8787

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Tuesday, October 22, 2024 8:49 AM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com;

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Subject: RE: Kadrey v. Meta - Depositions

Thanks, Phil. Responses inline below in **red font**.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Tuesday, October 22, 2024 8:16 AM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com;

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Max-

All of these witnesses have very busy work schedules, as well as family and personal obligations that they have to move around for these depositions. As you may have noticed, we have tried to give you witnesses in the requested date ranges wherever possible, including Mr. LeCun and Ms. Nayak. Regarding Ms. Nayak, if we are going to meet this schedule we need to get at least one deposition on calendar before November. **We disagree that busy work schedules—which of course are commonplace—could possibly excuse Meta not providing multiple dates in a two-month window. And we have immediately accepted almost all of the other single deposition dates for witnesses that Meta provided after receiving your emails as to those witnesses and dates. Also, to be clear, we asked for dates starting this Friday and Meta has provided a single witness in October. As for Ms. Nayak, I said the single date provided (Halloween) was difficult and asked for other dates around that time (or other times), but Meta refused to provide any. In any event, we will make that date work for Ms. Nayak. We cannot make the single date offered for Mr. LeCun work so please provide alternate dates.**

We are continuing to work on scheduling people in London, which is complicated by the fact we are voluntarily bringing employee-witnesses from Paris to London. We hope to have that resolved soon. **Thank you.**

Regarding Mr. Rodriguez, we updated the initial disclosures last night. **We asked that Meta provide his last known contact information—please do so. In any event, as he is still on your Rule 26 disclosures and thus someone Meta represents it may use to support its claims or defenses so Meta must produce him for deposition. Please let us know his availability for deposition and where you will make him available.**

With respect to Mr. Cox, we believe under the apex doctrine and in view of other depositions and discovery sought, his deposition should not go forward. We would like to understand why Plaintiffs have suddenly identified him. In the event the Court is inclined to permit his deposition, we believe it should be extremely limited in time. **We disagree with your characterization on timing. We also disagree any deposition of Mr. Cox should be limited but are happy to schedule a meet and confer. In the meantime, as requested, please provide his availability for deposition as we've requested.**

We also note that while Meta has been diligently identifying dates for witnesses and otherwise responding to your inquiries, we have received no response to our October 15 request for the depositions of Matthew Klam and Rachel Snyder. Please respond to this request today. Likewise, please provide availability for Mr. Farnsworth's deposition without further delay. **We disagree with your attempt to suggest that Meta has been diligent and Plaintiffs have not; that**

is incorrect and these sort of statements are not productive so hopefully we can leave them out moving forward. As for the dates you've requested, including now for Mr. Farnsworth, we will follow-up with the other firms who will be handling their depositions and ask them to get back to you as soon as possible.

Thank you preparing the joint status report draft. We trust that it will be non-argumentative and reflect the progress that Meta and Plaintiffs have made scheduling Meta's depositions. We hope so but welcome any redlines.

Regards,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Monday, October 21, 2024 11:07 PM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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[External]

Thanks, Phil.

Regarding Mr. LeCunn's and Ms. Nayak's depositions, given that Meta is refusing to provide any alternate dates we will include in the status report that the parties have a dispute as to their scheduling. Please confirm that the single dates you proposed initially are the only dates in the next two months these witnesses are available or can make themselves available.

We tentatively confirm Mr. Clark for 11/14. In addition, thank you for letting us know you will accept service of a subpoena on Mr. Roller—can you let us know his availability between 11/25 and 12/11?

Also, you we are still awaiting Meta's response to our request for clarification as to your representation of Aurelian Rodriguez in light of his identification on Meta's amended initial disclosures. Further, we are still waiting for your response on the other UK/EU witnesses before confirming Mr. Scialom for 12/5 in the hopes that the parties can agree to schedule those witnesses around the same time.

Regarding Mr. Cox, please let us now what you would like to M&C about and in the meantime provide his availability. We can meet and confer when you propose dates and times to M&C about 30(b)(6) topics.

Finally, Judge Hixson did not direct Plaintiffs to send you a draft status report by 9am pacific or even that we prepare the initial draft. But we will do so and provide it to you in advance of the noon deadline.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Monday, October 21, 2024 7:16 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L.

<adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Subject: RE: Kadrey v. Meta - Depositions

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Maxwell –

As a further update, we can offer Mike Clark on Thursday, November 14 (Denver). We are also authorized to accept service of a deposition subpoena for Steven Roller.

Regarding Mr. LeCunn and Ms. Nayak, we are offering the dates they have available. Please confirm.

We would also like to meet and confer regarding your request for a deposition of Mr. Chris Cox.

Given we have a status report on depositions due tomorrow, please send us a draft by 9am Pacific Time.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Monday, October 21, 2024 4:46 PM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Subject: RE: Kadrey v. Meta - Depositions

[External]

Hi Phil,

In response to your other email, we tentatively can confirm Chaya Nayak on 10/31 (SF), though that date is difficult so we would appreciate if you can let us know additional availability the following week.

We are still waiting to confirm Mr. Scialom for 12/5 until we hear back from you about the other UK/EU witnesses, and waiting to confirm Yann LeCun until we hear back about the alternate dates we requested.

Separately, Meta appears to have produced relatively few documents (little to no emails, mostly academic papers) from Ms. Pineau even though we understand was one of the initial custodians selected by Meta. Can you please confirm that Meta searched Ms. Pineau's custodial files (including all email and messaging accounts) for all potentially relevant and responsive information?

Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Monday, October 21, 2024 9:05 AM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Thanks, Phil.

We get back to you re Mr. Scialom, but will you be proposing the other London/EU depositions around that same time to consolidate?

Can confirm re: Messrs. Kerr (11/26), Nho (12/6), and Rao (12/13).

For Mr. LeCunn, 11/22 does not work currently—could we make 11/21, 11/24, or even 11/23 work?

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

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Counsel-

We can additionally offer Thomas Scialom on Thursday, December 5th (London). Please confirm this and the other four offered last night in the email immediately below.

Thanks,
Phil

From: Morton, Phillip <pmorton@cooley.com>

Sent: Sunday, October 20, 2024 11:11 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Counsel-

We can additionally offer Yann LeCunn on Friday, November 22nd (New York), Logan Kerr on Tuesday, November 26th (Bay Area), Eugene Nho on Friday, December 6th (Bay Area), and Arun Rao on Friday, December 13th (Bay Area). Please confirm.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Sunday, October 20, 2024 2:00 PM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

[External]

Thank you, Phil. Confirmed as to Ms. Pineau and Mr. Edunov on 11/6.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Sunday, October 20, 2024 5:59 AM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller

<JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey
<zmetakadrey@cooley.com>

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Max-

Thanks. We will circle back on these.

As an update, we are offering Joelle Pineau on Wednesday, November 6th (Montreal) and Sergey Edunov on Wednesday, November 6th (Bay Area). Please confirm.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Sunday, October 20, 2024 1:55 AM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Depositions

[External]

Phil,

In addition to the requested information below, please also provide dates between 11/11 and 12/14 for Susan Zhang, Thomas Scialom, and Sy Choudhury. We're providing these names in light of your assertion that you will not be representing Guillaume Lample, Edouard Grave, or Aurelien Rodriguez. We still intend to seek discovery from them but recognize the complications of doing so in the discovery period based on our understanding that they reside and work abroad. Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Friday, October 18, 2024 8:05 PM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Depositions

Thank you, Phil.

Aurelian Rodriguez is on Meta's amended initial disclosures and says contact through

Cooley--please advise. If that is in fact no longer the case, please let us know when that changed and his last known contact information. Please also let us know the other former employees' last known contact information.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Friday, October 18, 2024 5:56 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

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Counsel,

Thank you for sending the list of witnesses. We are assessing and actively working to identify dates of availability. We will circle back soon.

Regarding Guillaume Lample, Edouard Grave, Aurelien Rodriguez, and Steven Roller, we do not currently represent these former employees and are therefore not authorized to accept service for these individuals.

Please let us know how you intend to proceed. If you intend to forego these depositions and take others in their place, we would need to know that immediately and reserve all rights.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Thursday, October 17, 2024 4:54 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

[External]

Counsel,

We presently intend to notice depositions of the following individuals. Please let us know the following witnesses' availability between 10/24 and 11/8, and confirm their locations: Angela Fan, Mike Clark, Joelle Pineau, Chaya Nayak, and Sergey Edunov. Please let us know the

following witnesses' availability between 11/11 and 11/27, and confirm their locations: Guillaume Lample, Edouard Grave, Nikolay Bashlykov, Alex Boesenberg, Yann LeCunn, Amanda Kallet, Aurelien Rodriguez, and Hugo Touvron. We understand some of these individuals are former Meta employees so please let us know if you will be representing those individuals. Finally, please let us know the following witnesses' availability between 12/2 and 12/13: Logan Kerr, Chris Cox, Eugene Nho, Steven Roller, Sean Bell, Amrish Acharya, and Arun Rao. If any individuals are not available in the requested date ranges, please let us know their subsequent availability (or for those in the later date range, all of their availability before 12/13).

Also, we have asked repeatedly that Meta identify PMKs for our topics, including again on yesterday's M&C—please do so and provide their availability, or let us know by when you will provide that information, so that we can include it in the Tuesday report to Judge Hixson.

Thank you.

Best,
Max

From: Maxwell Pritt

Sent: Tuesday, October 15, 2024 4:31 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <DSimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Thank you, Liz. We will endeavor to do so tomorrow. Please let us know tomorrow as well who

you will be designating for each of the 30(b)(6) topics in the amended notice we served a week ago.

Best,
Max

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Tuesday, October 15, 2024 4:06 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Kadrey v. Meta - Depositions

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Counsel,

In view of the Court's order today, please provide us with the list of witnesses whose depositions Plaintiffs intend to take. We need these right away to investigate their availability and comply with Judge Hixson's instructions. We ask to receive this list by tomorrow.

In addition, please provide dates and locations for the depositions of Matthew Klam and Rachel Snyder. We reserve all rights with respect to Christopher Farnsworth pending the outcome of the consolidation decision.

Best,

Liz

Elizabeth L. Stameshkin

Cooley LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
+1 650 843 5121 office
+1 650 849 7400 fax
+1 626 644 7586 mobile
lstameshkin@cooley.com
Pronouns: she, her, hers

Cooley is committed to [racial justice](#)

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